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Of Attorneys for Plaintiff Providence Health & Services–Oregon

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

PROVIDENCE HEALTH & SERVICES–
OREGON, an Oregon nonprofit corporation, dba
Providence Portland Medical Center,

Plaintiff,

vs.

SANJANA PAHALAD MANCUSO, personal
representative of the Estate of Rattan Kumar
Pahalad, in her official and personal capacities,
and **ELAP SERVICES, LLC**, a Delaware
limited liability company,

Defendants.

Case No. 3:17-cv-00430-MO

DECLARATION OF LORELEI
A. CRAIG
In Support of Motion for Remand

LORELEI A. CRAIG states as follows:

1. I am counsel for plaintiff Providence Health & Services–Oregon in this matter.

2. Attached as Exhibit 1 is what purports to be an ELAP White Paper available on the website of Employee Benefit Management Services, Inc., and accessed at <http://www.ebms.com/documents/uploads/56904d1481e87.pdf>, on April 25, 2017.

3. Attached as Exhibit 2 is what purports to be an ELAP Balance Billing Frequently Asked Questions brochure located through an internet search and accessed at

<http://agorabenefitssolutions.com/wp-content/uploads/2016/05/ELAP-english.pdf>, on April 25, 2017.

4. Attached as Exhibit 3 is what purports to be an ELAP Balance Bill Basics brochure located through an internet search and accessed at <http://mybenefitsportal.com/ibt/wp-content/uploads/2015/05/GPA-ELAP-Frequently-Asked-Questions-on-Balance-Billing.pdf>, on April 25, 2017.

5. Attached as Exhibit 4 is a true and correct copy of notice from Group & Pension Administrators, Inc. to Rattan Kumar Pahalad, which was produced in the state court action by Defendant Sanjana Pahalad Mancuso (“Mancuso”), with bates number MANCUSO 000084

6. Attached as Exhibit 5 is a true and correct copy of Mancuso’s appeal letter dated October 19, 2016, to Group Pension Administrators requesting reconsideration of coverage denial for excess claim limits, which was produced in the state court action by Mancuso, with bates number MANCUSO 000090.

7. Attached as Exhibit 6 is a true and correct copy of ELAP’s denial of Mancuso’s October 19th appeal, dated February 13, 2017, which was produced in the state court action by Mancuso, with bates number MANCUSO 000261-MANCUSO 000267.

8. I declare under penalty of perjury that the foregoing is true and correct. Executed on April 25, 2017.

s/Lorelei A. Craig
Lorelei A. Craig

CERTIFICATE OF SERVICE

I certify that on April 26, 2017, I served or caused to be served a true and complete copy of the foregoing **DECLARATION OF LORELEI A. CRAIG** on the party or parties listed below as follows:

- ☒ Via CM / ECF Filing
- ☐ Via First Class Mail, Postage Prepaid
- ☐ Via Email
- ☐ Via Personal Delivery

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ELAP Services, LLC

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By: s/Arden J. Olson
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